

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**T.J. and C.J., on behalf of their minor child B.J.
Plaintiffs,**

v.

Case No. 12-565

**Danny Pacheco, a City of Espanola Police
Officer, and Sergeant Richard Gallegos, a
City of Espanola Police Officer, and, Lieutenant
Christian Lopez, a City of Espanola Police
Officer, Defendant City of Espanola, municipality,
Defendants.**

UNOPPOSED MOTION FOR ENTRY OF CONFIDENTIALITY AGREEMENT

COMES NOW Plaintiffs, by and through counsel, and, pursuant to the stipulation of opposing counsel, hereby requests that this Court enter the proposed stipulated confidentiality agreement in the above-styled cause.

As grounds therefore, Plaintiffs state:

1. All parties have agreed to the terms of the proposed confidentiality agreement.
2. The agreement is necessary to protect the Plaintiffs from any public or unnecessarily broad dissemination of his medical and psychological records, educational records, and materials and information which are otherwise protected from discovery by patient-medical care provider privilege, and/or the patient-counselor or patient/psychotherapist privilege.

WHEREFORE, Plaintiffs respectfully request that this Court enter the Stipulated Confidentiality Agreement.

Respectfully Submitted,

/s/ Shannon L. Kennedy

Shannon L. Kennedy

Joseph P. Kennedy

KENNEDY LAW FIRM

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I hereby certify that a true and correct copy of the foregoing was served upon opposing counsel via the CME/CF filing system on the day of its filing.

/s/ Shannon L. Kennedy

Shannon L. Kennedy